

**Administrative Record Index  
for the  
STAUFFER CHEMICAL CO. (LEMOYNE PLANT) NPL Site  
(Operable Unit #2)**

### **3.0 REMEDIAL INVESTIGATION (RI)**

#### **3.1 Correspondence**

1. Letter from James A. Nortz, Witco, to Joanne Benante, EPA Region 4. (June 03, 1996) Formalizing Witco's role as lead Responsible Party for the Halby Area and requesting that EPA deal directly with Witco when addressing Halby Area issues.

#### **3.10 Remedial Investigation (RI) Reports**

1. Letter from J.H. Zarzycki, EA Engineering, Science, and Technology, to Brian Farrier, EPA Region 4. (July 07, 1995) Concerning response to EPA comments on the "Sources Evaluation - Remedial Investigation," including a revised RI Report Chapter 5, Contaminant Fate and Transport.
2. Letter from J.H. Zarzycki, EA Engineering, Science, and Technology, to Brian Farrier, EPA Region 4. (July 17, 1995) Transmitting an RI report incorporating some of the following revisions: the transmitted document is the January 1994 RI as modified to include revision pages submitted 8/1/94 and 7/7/95, as well as additional appendices.
3. Letter from Annie Godfrey, EPA Region 4, to Mariam Tehrani, Akzo Nobel Chemicals Inc. (March 17, 1997) Transmitting EPA's response to Akzo's comments dated 3/14/94 on the Final Supplemental Remedial Investigation.
4. Letter from C.H. Cox, Alabama Department of Environmental Management, to Annie Godfrey, EPA Region 4. (March 28, 1997) Transmitting concurrence of the Supplemental Remedial Investigation in light of the recently published results of the background sediment samples in the Mobile River Study.
5. Letter from Mariam Tehrani, Akzo Nobel Chemicals Inc., to Annie Godfrey, EPA Region 4. (April 14, 1997) Transmitting the responses of Akzo Nobel and Witco to EPA's 3/17/97 comments on the Supplemental Remedial Investigation.
6. Letter from Annie Godfrey, EPA Region 4, to Mariam Tehrani, Akzo Nobel Chemicals Inc. (April 23, 1997) Concerning EPA's comments on Akzo's responses dated 4/14/97 and 4/17/97 to EPA's comments on the Supplemental Remedial Investigation and the Draft Feasibility Study.
7. "Final Supplemental Remedial Investigation - Cold Creek/LeMoyne Superfund Site - Operable Unit 2 - Solid Waste Management Units: Halby Area, Old Carbon Tetrachloride Wastewater Treatment Pond, Old Carbon Disulfide Wastewater Treatment Pond, Old Firewater Pond, Unnamed Tributary, LeMoyne Swamp," Akzo Nobel Chemicals Inc. (June 1997)
8. Cross Reference: Letter from C.H. Cox, Alabama Department of Environmental Management, to Annie Godfrey, EPA Region 4. (July 25, 1997) Concerning comments on the Proposed Plan and concurrence with the Supplemental Remedial Investigation, Feasibility Study, and the Supplemental Feasibility Study for the Halby Area. [Filed and cited in Entry Number 1 of 4.10 FEASIBILITY STUDY (FS) - Proposed Plans for Selected Remedial Action]
9. Letter from Annie Godfrey, EPA Region 4, to Mariam Tehrani, Akzo Nobel Chemicals Inc. (August 21, 1997) Transmitting comments on the Final Supplemental Remedial Investigation Report and the Supplemental Feasibility Study for the Halby Area.
10. Letter from Mariam Tehrani, Akzo Nobel Chemicals Inc., to Annie Godfrey, EPA Region 4. (September 17, 1997) Transmitting Akzo's response to EPA comments (dated 8/21/97) on the Final Supplemental Remedial Investigation Report and the Supplemental Feasibility Study for the Halby Area.

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**3.0 REMEDIAL INVESTIGATION (RI)****3.10 Remedial Investigation (RI) Reports**

11. Letter from Annie Godfrey, EPA Region 4, to Mariam Tehrani, Akzo Nobel Chemical Inc. (October 09, 1997) Transmittal of EPA comments to all of Akzo's previous responses on the Final Supplemental Remedial Investigation Report and the Supplemental Feasibility Study for the Halby Area.
12. Letter from Mariam Tehrani, Akzo Nobel Chemicals Inc., to Annie Godfrey, EPA Region 4. (October 23, 1997) Concerning Akzo's response to EPA's 10/9/97 comment letter on the Final Supplemental Remedial Investigation Report and the Supplemental Feasibility Study for the Halby Area.
13. Letter from Annie Godfrey, EPA Region 4, to Mariam Tehrani, Akzo Nobel Chemicals Inc. (November 03, 1997) Concerning EPA's approval of the Supplemental Remedial Investigation Report, the Feasibility Study (FS) and the Supplemental FS for the Halby Area.
14. Cross Reference: Letter from Annie M. Godfrey, EPA Region 4, to Mariam R. Tehrani, Akzo Nobel Chemicals, Inc. Concerning Supplemental RI/FS information including Alternative 7 cost estimates and Akzo expansion plans. (November 30, 1998) [Filed and cited in Entry Number 22 of 4.9 FEASIBILITY STUDY (FS) - Feasibility Study (FS) Reports]

**3.12 Endangerment Assessments**

1. Memorandum from Dr. Harlal Choudhury, US EPA Superfund Health Risk Technical Support Center, National Center for Environmental Assessment, to Joanne Benante, EPA Region 4, and Eric Newman, EPA Region 3. Concerning the Systemic Oral Toxicity Information on Thiocyanate for the Stauffer Chemical Site in Region 4 and the Halby Chemical Site in Region 3. Attached is the "Risk Assessment Issue Paper for: Derivation of a Provisional RfD for Thiocyanate" DRAFT. (June 25, 1996)
2. Letter from Elmer Akin, EPA Region 4, and Joanne Benante, EPA Region 4, to R. Vyas, Witco Corporation. (July 08, 1996) Transmittal of the revision of EPA's provisional RfD for the toxicity of thiocyanate.
3. Cross-Reference: The BASELINE RISK ASSESSMENT can be found in the FINAL SUPPLEMENTAL REMEDIAL INVESTIGATION, Section 6. (June 24, 1997) [Filed and cited as Entry Number 7 in 3.10 REMEDIAL INVESTIGATION (RI) - Remedial Investigation (RI) Reports].
4. Memorandum from Kevin P. Koporec, Toxicologist, EPA Region 4, to Annie Godfrey, EPA Region 4. Concerning a synopsis of the derivation of the health risk-based remedial goal option for Thiocyanate in subsurface soil for the Stauffer LeMoyne NPL Site. (September 30, 1998)

**4.0 FEASIBILITY STUDY (FS)****4.1 Correspondence**

1. Letter from Timothy F. Malloy, Manko, Gold & Katcher, to Gregory Luecher [Luetscher], EPA Region 4. Concerning active and passive soil flushing remedies for the Stauffer LeMoyne Superfund Site - Halby Area. (November 05, 1997)

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#### **4.0 FEASIBILITY STUDY (FS)**

##### **4.2 Sampling and Analysis Data**

1. Cross Reference: Letter from Mariam R. Tehrani, Akzo Nobel Chemicals Inc., to Annie Godfrey, EPA Region 4. Transmitting Supplemental RI/FS information including groundwater analytical results of the groundwater extraction wells and Alternative # 7 cost estimate clarification. Also, concerns about existing wastewater treatment system at Lemoyne. (January 04, 1998) [Filed and cited in Entry Number 19 of 4.9 FEASIBILITY STUDY (FS) - Feasibility Study (FS) Reports]
2. "Stauffer LeMoyne Superfund Site, Former Halby Area Soil and Ground Water 1998 Sampling Results," Witco Corporation for EPA Region IV. (July 06, 1998)
3. Memorandum from Gary Bennett, Office of Quality Assurance, EPA Region 4, to Annie Godfrey, EPA Region 4. Concerning review of "Report on the Results of Supplemental Sampling, Halby Area, Stauffer LeMoyne Superfund Site," dated July 6, 1998. (November 23, 1998)

##### **4.9 Feasibility Study (FS) Reports**

1. Letter from Joanne Benante, EPA Region 4, to J.H. Zarzycki, EA Engineering, Science, and Technology. (November 14, 1995) Concerning disapproval of the Draft Focused Feasibility Study, as well as transmittal of the comments on the Draft Focused Feasibility Study. NOTE: THE SITE DISCUSSED IN THIS LETTER IS NOT THE STAUFFER (COLD CREEK PLANT) SITE, BUT RATHER THE STAUFFER (LEMOYNE PLANT) SITE.
2. Letter from Joanne Benante, EPA Region 4, to J.H. Zarzycki, EA Engineering, Science, and Technology. (December 05, 1995) Disapproving the Draft Feasibility Study, with comments. NOTE: THE SITE DISCUSSED IN THIS LETTER IS NOT THE STAUFFER (COLD CREEK PLANT) SITE, BUT RATHER THE STAUFFER (LEMOYNE PLANT) SITE.
3. Letter from J.H. Zarzycki, EA Engineering, Science, and Technology, to Joanne Benante, EPA Region 4. (January 11, 1996) Transmitting responses to EPA comments (dated 11/14/95 and 12/5/95) on the Draft Feasibility Study.
4. Letter from Raj Vyas, Witco Corporation, to Joanne Benante, EPA Region 4. (February 29, 1996) Concerning Witco's response to EPA's 12/5/95 comments on the Draft Feasibility Study.
5. Letter from Annie Godfrey, EPA Region 4, to Mariam Tehrani, Akzo Nobel Chemicals Inc. (March 20, 1997) Transmitting EPA's response to EA's 1/11/96 comments and Witco's 2/29/96 comments on the Draft Feasibility Study. EPA also agrees that Witco may submit an addendum to the Feasibility Study to address the Halby issues.
6. Letter from Mariam Tehrani, Akzo Nobel Chemicals Inc., to Annie Godfrey, EPA Region 4. (April 17, 1997) Transmitting Akzo's and Witco's responses to comments made by EPA on the Draft Feasibility Study dated 3/20/97.
7. Cross Reference: Letter from Annie Godfrey, EPA Region 4, to Mariam Tehrani, Akzo Nobel Chemicals Inc. (April 23, 1997) Concerning EPA's comments on Akzo's responses dated 4/14/97 and 4/17/97 to EPA's comments on the Supplemental Remedial Investigation and the Draft Feasibility Study. [Filed and cited in Entry Number 6 of 3.10 REMEDIAL INVESTIGATION (RI) - Remedial Investigation (RI) Reports]
8. "Feasibility Study - Stauffer LeMoyne Superfund Site: Operable Unit No. 2," Submitted by Akzo Nobel Chemicals Inc. (June 24, 1997) [Note: The letter transmitting the Feasibility Study appears before the Feasibility Study in the Administrative Record].

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**4.0 FEASIBILITY STUDY (FS)****4.9 Feasibility Study (FS) Reports**

9. Letter from Mariam Tehrani, Akzo Nobel Chemicals Inc., to Annie Godfrey, EPA Region 4. Transmitting the Feasibility Study. (June 24, 1997) [Note: The letter transmitting the Feasibility Study appears before the Feasibility Study in the Administrative Record].
10. Cross-Reference: Letter from C.H. Cox, Alabama Department of Environmental Management, to Annie Godfrey, EPA Region 4. Concerning comments on the Proposed Plan and concurrence with the Supplemental Remedial Investigation, Feasibility Study, and the Supplemental Feasibility Study for the Halby Area. (July 25, 1997) [Filed and cited in Entry Number 1 of 4.10 FEASIBILITY STUDY (FS) - Proposed Plans for Selected Remedial Action].
11. Cross Reference: Letter from Annie Godfrey, EPA Region 4, to Mariam Tehrani, Akzo Nobel Chemicals Inc. (August 21, 1997) Transmitting comments on the Final Supplemental Remedial Investigation Report and the Supplemental Feasibility Study for the Halby Area. [Filed and cited in Entry Number 9 of 3.10 REMEDIAL INVESTIGATION (RI) - Remedial Investigation (RI) Reports]
12. Cross Reference: Letter from Mariam Tehrani, Akzo Nobel Chemicals Inc., to Annie Godfrey, EPA Region 4. (September 17, 1997) Transmitting Akzo's response to EPA comments (dated 8/21/97) on the Final Supplemental Remedial Investigation Report and the Supplemental Feasibility Study for the Halby Area. [Filed and cited in Entry Number 10 of 3.10 REMEDIAL INVESTIGATION (RI) - Remedial Investigation (RI) Reports]
13. Letter from Raj Vyas, Witco, to Annie Godfrey, EPA Region 4. (September 18, 1997) Concerning Witco's response to EPA 8/21/97 comments on the 6/25/97 Draft Supplemental Feasibility Study for the Halby Area.
14. "Supplemental Feasibility Study for the Halby Area, Stauffer LeMoyne Superfund Site, LeMoyne, Alabama," Witco Corporation. (October 1997) [NOTE: This document appears after the letter dated 10/24/97 in the Administrative Record].
15. Cross Reference: Letter from Annie Godfrey, EPA Region 4, to Mariam Tehrani, Akzo Nobel Chemical Inc. (October 09, 1997) Transmittal of EPA comments to all of Akzo's previous responses on the Final Supplemental Remedial Investigation Report and the Supplemental Feasibility Study for the Halby Area. [Filed and cited in Entry Number 11 of 3.10 REMEDIAL INVESTIGATION (RI) - Remedial Investigation (RI) Reports]
16. Cross Reference: Letter from Mariam Tehrani, Akzo Nobel Chemicals Inc., to Annie Godfrey, EPA Region 4. (October 23, 1997) Concerning Akzo's response to EPA's 10/9/97 comment letter on the Final Supplemental Remedial Investigation Report and the Supplemental Feasibility Study for the Halby Area. [Filed and cited in Entry Number 12 of 3.10 REMEDIAL INVESTIGATION (RI) - Remedial Investigation (RI) Reports]
17. Letter from Dean Sibert, ERM Environmental Resources Management, Annie Godfrey, EPA Region 4. (October 24, 1997) Concerning ERM's response (for Witco) to EPA's 10/9/97 comments on the Supplemental Feasibility Study for the Halby Area.
18. Cross Reference: Letter from Annie Godfrey, EPA Region 4, to Mariam Tehrani, Akzo Nobel Chemicals Inc. (November 03, 1997) Concerning EPA's approval of the Supplemental Remedial Investigation Report, the Feasibility Study (FS) and the Supplemental FS for the Halby Area. [Filed and cited in Entry Number 13 of 3.10 REMEDIAL INVESTIGATION (RI) - Remedial Investigation (RI) Reports]

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**4.0 FEASIBILITY STUDY (FS)****4.9 Feasibility Study (FS) Reports**

19. Letter from Mariam R. Tehrani, Akzo Nobel Chemicals Inc., to Annie Godfrey, EPA Region 4. Transmitting Supplemental RI/FS information including groundwater analytical results of the groundwater extraction wells and Alternative # 7 cost estimate clarification. Also, concerns about existing wastewater treatment system at Lemoyne. (January 04, 1998)
20. "Supplemental Information on Remedial Flushing Systems, Halby Area at Stauffer-LeMoyne Superfund Site," Environmental Resource Management for Witco Corporation. (September 23, 1998)
21. Letter from Marie Pittignano, Witco Corporation, Annie Godfrey, EPA Region 4. Transmitting the "Supplemental Information on Remedial Flushing Systems, Halby Area at Stauffer-LeMoyne Superfund Site," Environmental Resource Management for Witco Corporation. (September 23, 1998)
22. Letter from Annie M. Godfrey, EPA Region 4, to Mariam R. Tehrani, Akzo Nobel Chemicals, Inc. Concerning Supplemental RI/FS information including Alternative 7 cost estimates and Akzo expansion plans. (November 30, 1998)
23. Letter from Marie Pittignano, Witco Corporation, to Annie Godfrey, EPA Region 4. Concerning and transmitting alternative cost estimate revisions to the Feasibility Study. (January 27, 1999)

**4.10 Proposed Plans for Selected Remedial Action**

1. Letter from C.H. Cox, Alabama Department of Environmental Management, to Annie Godfrey, EPA Region 4. (July 25, 1997) Concerning comments on the Proposed Plan and concurrence with the Supplemental Remedial Investigation, Feasibility Study, and the Supplemental Feasibility Study for the Halby Area.
2. "Proposed Plan Fact Sheet, Stauffer LeMoyne Superfund Site, Operable Unit #2," EPA Region 4. (July 1998)

**5.0 RECORD OF DECISION (ROD)****5.1 Correspondence**

1. Cross-Reference: Concurrence letter from Wm. Gerald Hardy, Land Division Chief, Alabama Department of Environmental Management, to Annie Godfrey, EPA Region 4. Concurring with the Draft Record of Decision (ROD). (March 18, 1999) [Filed and cited as Appendix 2 in Entry Number 1 of 5.9 RECORD OF DECISION (ROD) - Record of Decision (ROD)].

**5.2 Responsiveness Summaries**

1. Cross-Reference: Responsiveness Summary to Public Comments. (March 18, 1999) [Filed and cited as Appendix 1 in Entry Number 1 of 5.9 RECORD OF DECISION (ROD) - Record of Decision (ROD)].

**5.9 Record of Decision (ROD)**

1. "Record of Decision, Summary of Remedial Alternative Selection, Stauffer Chemical Co. (LeMoyne Plant) Site, Operable Unit 2, Axis, Mobile County, Alabama," EPA Region 4. (March 18, 1999)

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**13.0 COMMUNITY RELATIONS**

**13.9 Fact Sheets**

1. Cross Reference: "Proposed Plan Fact Sheet, Stauffer LeMoyne Superfund Site, Operable Unit #2," EPA Region 4. (July 1998) [Filed and cited in Entry Number 2 of 4.10 FEASIBILITY STUDY (FS) - Proposed Plans for Selected Remedial Action]

**17.0 SITE MANAGEMENT RECORDS**

**17.1 Correspondence**

1. Memorandum from Annie M. Godfrey, EPA Region 4, to Files. Concerning phone conversation with Larry Parker, LeMoyne Water System Manager/Operator, and the water supply in the LeMoyne Area. (December 10, 1998)